

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)	
)	
AMENDEMENT OF PART 97 OF THE)	
COMMISSION'S RULES GOVERNING)	<u>RM-10870</u>
THE AMATEUR RADIO SERVICE)	
)	
PETITION FOR RULE MAKING BY)	
THE NATIONAL CONFERENCE)	
OF VOLUNTEER EXAMINER)	
COORDINATORS)	

April 21, 2004

To: The Chief, Wireless Telecommunications Bureau

MY COMMENTS ON THE PETITION FOR RULE MAKING, RM10870

I. Introduction

I have been a licensed operator since 1972. I have an Amateur Extra class license (W8EH), having passed it back when the commission was still administering the exams. I am also a volunteer examiner for the ARRL-VEC. I participate as an instructor for license preparation classes.

II. National Conference of Volunteer Examiner Coordinators Petition

The "National Conference of Volunteer Examiner Coordinators" petition has a couple good ideas but does not follow my thinking, by wanting to eliminate Morse code telegraphy testing from ALL licenses.

Although their plan for the future of amateur radio may do some good, they want to make a very major change by completely eliminating the Morse code telegraphy requirement. For that and other reasons I don't fully support it.

My vote is for the American Radio Relay League (ARRL) petition. The ARRL petition is more in line with the mainstream amateur radio operator.

III. License Structure

Their petition proposes that the license structure is bad. This is true. The left over Advanced should have been grandfathered to Extra class during the last commission restructuring of amateur radio. Elimination of the Novice license testing created a very high first hurdle for a beginner to jump over. I agree with their statements in their paragraph 10. The Technician license covers too broad of subject matter.

The testing on the Technician is also very 'inclusive' and covers many topics that a beginner does not need to know. It does not meet the definition of an entry class license that we need to interest the young people.

In paragraph 11 they point out that present system discourages many potential applicants. From my experience, this is true. Our local radio club conducts Technician classes twice a year. Each time we experience a drop out rate greater than 50%.

Amateur radio licensing should provide a way for the beginner licensees to have significant, but limited access to the worldwide HF bands for voice and data operation. I do agree with their statement in paragraphs 2, 11 and 12. The old Novice class license did provide a path for a beginner to enter amateur radio. I entered amateur radio in 1972 via the novice license path. It was a good plan back then. The problem was that the license became 'stale'. It did not provide enough privileges on the world wide HF bands, where the main stream amateur radio operators are located. And it did not provide privileges that included the newer digital modes on those HF bands. And the Morse code telegraphy testing was a hurdle that a beginner should not have had to overcome. It lost favor because it was too limiting to the beginner.

IV. Their Proposal

I agree with their statements in paragraph 17 that we "need to reestablish the concept of having an entry level license that allows access to Amateur Radio in a meaningful way." There should be power limits to keep them away from the hazards of RF safety; limits on the type of stations that they can be control operators for; and exclusions from bands where there are potential hazards (microwaves).

In paragraph 19 they propose to name the beginner class "communicator". While this might sound good, I propose that it be named the traditional "Novice" and all present Novice licensees be taken in by this new Novice.

They propose also in paragraph 19 to set power limits to get under the RF safety evaluations. This is a good idea. It will also reduce the scope of their question pool since they will not be reaching a level where they will be required to do evaluations. The electrical and equipment restrictions sound good for a beginner. The proposed modes and bands of operation sound good to me too.

V. Examinations

I do disagree with their proposal to have the number of questions for the beginner class set at 20. While I feel that the scope of the exam for the beginner class should be very limited, 20 questions seem to be a little on the low side. A 25 question exam sounds better. It will give the applicant a more thorough test on a more limited question pool. It will be more acceptable to those who will claim it will be too 'easy'.

VI. Frequency Privileges

Their proposed frequency privileges in paragraph 21 are very close to my opinion. But here I would suggest you defer to the ARRL petition (RM-10867) for frequency band privileges. The ARRL did conduct a survey of members and what they proposed in their petition was more in line with the ideas of the mainstream amateur radio operators. There is no question that the beginner license should have limited access to the bands that both of these petitions suggest.

VII. License Upgrades of Existing Licenses

I agree with the statement in paragraph 25 that ALL Technician, Technician Plus licenses be upgraded to General. The difference between these licenses is minimal. Technician licenses issued before 2000 did include some study material that covered HF band operations.

I agree with the statements in paragraph 26 that we should upgrade ALL Advanced class licensees to Extra class. There is minimal difference between these licenses. The present Extra class license testing resembles the syllabus of the old Advanced class.

This change will finally reduce the number of licenses to the three that the commission intended in the last restructuring proceeding.

VIII. Morse Telegraphy Requirements

I STRONGLY disagree with their proposal in paragraph 28 to eliminate Morse code telegraphy testing for all classes. I feel we should RETAIN the 5 word per minute test for the Extra class and eliminate it for all others. The additional privileges for the Extra class license are mainly in the Morse/CW band segments.

I believe that it will be too big of a step to throw out Morse code entirely. Retaining it for the Extra class only, will keep the tradition alive for a while longer and will help maintain that telegraphy skill in the amateur service. This could be revisited in the future, but for now we do need to hold onto a bit of the past tradition.

This is where I think we should follow the ARRL petition (RM-10867). They promote retaining the Morse code telegraphy testing for the Extra class and eliminating it for all other classes.

Being an instructor and volunteer examiner, I can say the telegraphy requirement has kept many off of the world wide HF bands. It kept many completely out of the amateur radio service before the commission saw fit to remove it from the Technician class license. Eliminating the Morse code telegraphy requirement for the mainstream General class and a beginner license is OK by me. Morse telegraphy is but a small part of the HF band activities. I know of quite a few in our local area who want to get on the HF bands to operate voice and digital modes, but can't get over the hurdle of the Morse code testing. Some people just don't have the skills to learn and pass the Morse telegraphy test. These are the ones who will be more than adequately served by the elimination of the Morse code telegraphy requirement for General and 'novice' classes.

IX. Summary

The commission needs to fully address the license structure and Morse code requirements in one proceeding.

The commission should remove the Morse code telegraphy testing requirement from the beginner license and the General class license.

The commission should also grandfather all existing Advanced licenses to Extra class, and all existing Technician licenses to General.

The commission should create a new beginner license based on the old Novice license, but with limited voice/data privileges on the 80, 40, 15 and 10 meter bands, as well as full privileges on 6, 2, 1.25 meters and 70 centimeter bands.

As much as possible, no license class should lose privileges in this restructuring.

Respectfully submitted,

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